

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TBK BANK SSB,	)	
	)	Case No. 1:24-cv-01443
Plaintiff,	)	
	)	
v.	)	Hon. Mary M. Rowland
	)	
CREED TRANSPORT, INC,	)	
BRATISLAV MILANOVIC,	)	
MILOS MARKOVIC, and	)	
BOJAN BLAZIC,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF’S FEDERAL RULE OF CIVIL PROCEDURE 55(b)  
MOTION FOR JUDGMENT**

Plaintiff TBK Bank SSB (“TBK”), by and through its attorneys, and in accordance with this Court’s docket entries dated September 17, 2024 (Dkt. 18) and October 23, 2024 (Dkt. 21) hereby files this Federal Rule of Civil Procedure 55(b) Motion for Judgment with supporting affidavit and in support thereof states as follows:

**PROCEDURAL HISTORY**

1. On February 21, 2024, TBK filed its Verified Complaint against Defendants Creed Transport, Inc., Bratislav Milanovic, Milos Markovic and Bojan Blazic (collectively, the “Defendants”). (Dkt. 1). On February 22, 2024, summons were issued to the Defendants.
2. On March 20, 2024 and April 6, 2024, service was effectuated on Defendants Bojan Blazic and Creed Transport, Inc., respectively.
3. On May 13, 2024, the affidavits of service for Defendants Bojan Blazic and Creed Transport, Inc. were filed with the Court. (Dkt. 9, 10).

4. On May 22, 2024, TBK filed a Status Report Regarding Service of Process and Motion for Alternative Service on Defendants Bratislav Milanovic and Milos Markovic that attached a Declaration by TBK's counsel and affidavits of non-service. (Dkt. 11, 12).

5. On May 24, 2024, the Court granted TBK's Motion for Alternative Service and permitted TBK to serve: (1) Markovic by mailing copies of the summons and complaint by certified mail, return receipt requested and regular mail to his personal address; and (2) Milanovic by mailing copies of the summons and complaint by certified mail, return receipt requested and regular mail. (Dkt. 13).

6. On May 24, 2024, TBK served Milos Markovic and Bratislav Milanovic in accordance with the Court's May 24, 2024 Order. (Dkt. 14).

7. On August 16, 2024, this Court entered a docket entry requiring that Plaintiff file a motion for default judgment or status report on or before September 16, 2024. (Dkt. 16).

8. On September 17, 2024, this Court granted TBK's motion for default. (Dkt. 18).

9. On October 23, 2024, this Court directed TBK to "file a status report or a motion pursuant to FRCP 55(b) with a supporting affidavit attesting to the amount of monetary damages sought against Defendants." (Dkt. 21).

10. TBK hereby submits the Affidavit of Tulani Ruffin attached hereto as **Exhibit A**.

### **RELIEF REQUESTED**

11. Pursuant to Federal Rule of Civil Procedure 55(b), TBK requests that the clerk:

- a. enter judgment in the amount of \$141,226.04, jointly and severally, against defendants (1) Creed Transport, Inc.; (2) Bratislav Milanovic; (3) Milos Markovic; and (4) Bojan Blazic; and

- b. enter an order of replevin pertaining to the following personal property: (a) GREAT DANE, DRY VAN, Serial No. 1GRAA0621KT120892; (b) KENWORTH, T680, Serial No. 1XKYDP9X5LJ312317; and (c) KENWORTH, T680, Serial No. 1XKYDP9X4HJ118885.

WHEREFORE, Plaintiff TBK Bank SSB respectfully requests the foregoing relief together with any other relief this Court deems equitable and just.

Dated: November 5, 2024

TBK Bank SSB

By: Thomas B. Fullerton  
One of its Attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2024, a copy of the foregoing Plaintiff's Federal Rule of Civil Procedure 55(b) Motion for Judgment with supporting affidavit was filed electronically and notice of this filing will be sent to all appearing parties by operation of the Court's electronic filing system. Notice of this filing will also be sent to the following parties by U.S. Mail, first class postage pre-paid:

Creed Transport, Inc.  
2515 Glenview Road  
Glenview, IL 60025

Bojan Blazic  
2515 Glenview Road  
Glenview, IL 60025

Milos Markovic  
4330 N. Whipple Street  
Chicago, IL 60618

Bratislav Milanovic  
2515 Glenview Road  
Glenview, IL 60025

/s/ Thomas B. Fullerton